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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001 O3 MDL 1570 (RCC)
ECF Case

This document relates to:

Estate of O'Neill, et al. v. The Republic of Iraq, et al., Case No. 04 CV 1076 (RCC) (S.D.N.Y.)

Estate of O'Neill, et al. v. Al Baraka, et al., Case No. 04 CV 1923 (RCC) (S.D.N.Y.)

STIPULATION AS TO THE EXTENSION OF TIME TO RESPOND TO COMPLAINTS FOR DEFENDANTS SCHREIBER & ZINDEL, FRANK ZINDEL, ENGELBERT SCHREIBER, AND ENGELBERT SCHREIBER, JR.

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs in the above referenced cases consolidated under 03 MDL 1570 and Defendants Schreiber & Zindel, Frank Zindel, Engelbert Schreiber, and Engelbert Schreiber, Ir. ("Defendants"), by and through their undersigned counsel, that the time for Defendants to answer, move, or otherwise plead to the Second Amended Complaints in each of the cases referenced above, shall be extended to and including May 20, 2005.

IT IS FURTHER HEREBY STIPULATED AND AGREED that the Plaintiff's will file a RICO statement relating to the Defendants within thirty (30) days from the date the Defendants answer, move or otherwise plead in response to the Second Amended Complaints in each of the cases referenced above.

IT IS FURTHER HEREBY STIPULATED AND AGREED that the Plaintiffs' responses to any motions Defendants may file in response to the Second Amended Complaints shall be filed within sixty (60) days of receipt of the same from Defendants'

counsel, and that Defendants' counsel shall file reply memoranda, if any, within twentyone (21) days of receipt of Plaintiffs' opposing papers.

Respectfully Submitted,

SCHIFF HARDIN LLP

Dated: 4/27/05

Donald A. Klein (DK7821)

623 Fifth Avenue

New York, NY 10022

&

6600 Sears Tower

Chicago, IL 60606

Attorneys for Defendants

LAW OFFICES OF TERRY S. GOLDMAN & ASSOCIATES, P.C.

By:

Jerry S. 111 Broodway, 13th Floor

New York, NY 10006

Attorney for Plaintiff

SO ORDERED: